

POLREP #21 AND FINAL

VALLEY FORGE NATIONAL HISTORICAL PARK ASBESTOS SITE
RTE 23 & GULPH RD

VALLEY FORGE, MONTGOMERY COUNTY, PA 19482

ATTN: RRC, CHARLIE KLEEMAN

CC: EARL CRAM, NATIONAL PARK SERVICE
ERNEST RALSTON, NATIONAL PARK SERVICE

EVENT: EMERGENCY RESPONSE/SITE ASSESSMENT

I. SITUATION (AS OF 1700 HOURS, THURSDAY, 3 JULY 1997)

- A. THIS POLREP COVERS WORK FROM 30 JUNE THROUGH 3 JULY 1997.
- B. OSC KOOB CONTINUED COORDINATION OF SITE ACTIVITIES WITH ASSISTANCE OF FOSC REP CRAM THROUGHOUT THIS PERIOD.
- C. ESTIMATED COSTS TO DATE (COB 6/23/97):
COST TO DATE CEILING (COB 6/27/97)
EPA (DIRECT) \$ 2,965 \$ 20,000
EPA (INDIRECT) \$ 6,304 \$ 30,000
ERCS \$ 150,674 \$ 215,000
SATA \$ 10,825 \$ 50,000
UNALLOCATED 35,000

TOTAL \$ 170,768 \$ 350,000
- D. PERSONNEL ON SITE: EPA-1, VFNPS-1, SATA-1, ERCS-1, CONWAY - 4, E&E - 2, E&E CONTRACTORS - 4
- E. WEATHER: HOT AND HUMID, TEMPERATURES IN THE HIGH 80'S.
- F. MEDIA INTEREST: Low

II. ACTIONS TAKEN

- A. ON 30 JUNE NPS CRAM, ERCS RM, SATA, AND ERCS SUBCONTRACTOR CONDUCTED FINAL MEASUREMENT OF STABILIZED ON-SITE. A TOTAL OF 62478.30 Sqft ACM WAS DISCOVERED EXPOSED ONSITE. OF THAT AMOUNT 18360.2 Sqft WAS COVERED BY ERC'S WITH SOIL. A FINAL MEASURED AREA OF 20,704 SQUARE FEET HAS BEEN STABILIZED. 24,0034 Sqft REMAIN EXPOSED UNDERCOVER OF A FIXED WATER SPRINKLER OR DIRECTED STREAM APPLICATION ON-SITE. ERCS SUBCONTRACTORS DEMOBILIZED FROM THE SITE ON 30JUNE97.
- B. ON 30 JUNE ANALYTICAL RESULTS WERE RECEIVED FROM NPS LABORATORY FOR BULK SAMPLES COLLECTED AT THE POD, MAINTENANCE AREA, RAILBED CUTOUT, AND PENNDOT QUARRY. THESE RESULTS CONFIRMED THE PRESENCE OF ASBESTOS IN

- CONCENTRATIONS GREATER THAN 1% IN ALL AREAS EXCEPT PENNDOT QUARRY AND MAINTENANCE AREA.
- C. ON 1 JULY, OSC KOOB, NPS CRAM, ERCS RM, AND SATA CONFIRMED FINAL MEASUREMENTS FOR STABILIZED AREA. ON ERCS AND SATA DEVELOPED A SPRINKLER SYSTEM TO MAINTAIN ALL EXPOSED ASBESTOS AREAS IN A WETTED STATE.
 - D. OSC KOOB AND NPS CRAM SPOKE TO NPS REPRESENTATIVES IN WASHINGTON D.C. ON 1 JULY REGARDING COMPLETION OF EPA ACTIVITIES AND NPS INTENTIONS AT THE SITE. NPS INFORMED OSC KOOB THAT NPS MONIES FOR CONTRACTORS WERE IN PLACE AND NPS WOULD BE PREPARED TO CONTINUE OPERATIONS AT THE SITE UPON COMPLETION OF EPA EMERGENCY RESPONSE ACTIVITIES.
 - E. ON 2 JULY, ERCS RM AND SATA CONSTRUCTED SPRINKLER SYSTEMS IN ALL AREAS OF REMAINING EXPOSED ASBESTOS WITH THE EXCEPTION OF AREA #17, WHICH IS A CREEK BED AND THEREFORE REMAINS WET AT ALL TIMES.
 - F. PHILADELPHIA SUBURBAN WATER COMPANY INSTALLED A REGULATOR AND LOCK BOX AT THE FIRE HYDRANT LOCATED ON COUNTY LINE ROAD ACROSS FROM THE AMPHITHEATER BUILDING FOR PURPOSES OF SUPPLYING WATER TO THE SPRINKLER SYSTEM INSTALLED BY ERCS RM AND SATA. NPS PERSONNEL COMPLETED A PVC CONNECTION FROM THE FIRE HYDRANT TO THE SPRINKLER SYSTEM ON 2 JULY.
 - G. ON 3 JULY, NPS CRAM, SATA, ERCS RM, AND NPS CONTRACTORS (ECOLOGY & ENVIRONMENT) COMPLETED A TOUR OF THE SITE. THE ERCS/SATA INSTALLED SPRINKLER SYSTEMS WERE TESTED. OSC KOOB OFFICIALLY TERMINATED EPA ACTIVITIES AT THE SITE AFTER CONDUCTING AN EVALUATION AND INSPECTION OF THE SPRINKLER SYSTEM FINDING IT TO BE IN SATISFACTORY OPERATIONAL CONDITION NPS ASSUMED RESPONSIBILITY FOR SITE MAINTAINING SITE IN A STABILIZED CONDITION AND CONTINUATION OF REMEDIATION EFFORTS AT THE PARK.
 - H. EPA, SATA, AND ERCS DEMOBILIZED FROM THE SITE ON 3 JULY 1997.

III. FUTURE ACTIONS

- A. AS OF 04JUL97 OSC KOOB STANDS RELIEVED. NPS IS THE LEAD FEDERAL AGENCY FOR ALL ACTIVITIES CONDUCTED IN RESPONSE TO CONTAMINATION AT THE SITE PER 40 CFR 300.120(C)(2) HENCE FORWARD.
- B. NPS TO CONTINUE ACTIVITIES AT THE SITE TO ADDRESS THE REMAINING SIGNIFICANT AMOUNT OF ACM CONTAMINATION. OSC KOOB TO PROVIDE TO PARK SUPERINTENDENT ARTHUR STEWART WITH AN EXTENT OF CONTAMINATION SURVEY PLAN FOR THE PARK.

- C. NPS CONTRACTORS TO CONTINUE WETTING AND FENCE MAINTENANCE OPERATIONS IN AREAS OF CONCERN.
- D. NPS CONTRACTORS TO CONTINUE AIR SAMPLING ACTIVITIES AT THE SITE.
- E. US EPA REGION III FEDERAL FACILITIES PROGRAM DARIUS OSTRASKAS ASSIGNED AS EPA LIASON FOR FUTURE SITE REMEDIATION EFFORTS.
- F. NO FURTHER EPA REMOVAL RESPONSE ACTIVITIES AT THE SITE ARE ANTICIPATED.

F. KEVIN KOOB, OSC
U.S. EPA REGION III
PHILADELPHIA, PA 19107